

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

JOHN DOE,

Plaintiff,

V.

MISSION WACO, A TEXAS NON-PROFIT ORGANIZATION, MISSION WACO WORLD CUP CAFÉ, A BUSINESS AND INDIVIDUALS OR ENTITIES ASSOCIATED WITH THE ADVERSE ACTIONS INFLUENCED BY COMMENTS AND ACTIONS DIRECTED TOWARD PLAINTIFF AFFECTING THE LEVEL OF SERVICE INSIDE OF THE CAFÉ,

Defendants.

Civil Action No. 6:24-cv-00600-ADA-JCM

JOINT AGREED MOTION FOR EXTENSION OF DISPOSITIVE MOTION DEADLINE

Plaintiff, Lant Chapman (“Plaintiff”) and Defendant Mission Waco, Mission World, Inc.¹ (“Defendant”) (collectively, “Parties”) file this Joint Agreed Motion for Extension of Dispositive Motion Deadline, and in support thereof, respectfully shows the Court as follows:

1. On January 21, 2025, the Court issued its Scheduling Order (“Scheduling Order”) ordering that: (1) fact discovery close on April 25, 2025 (“Fact Discovery Deadline”); and (2) dispositive motions be filed and served on all other parties on or before May 2, 2025 (“Dispositive Motion Deadline”). ECF 22, Scheduling Order, p. 1 – 2.

¹ Defendant Mission Waco, Mission World, Inc. is improperly named as two defendants in pro se Plaintiff's pleadings as "Misson Waco, a Texas Non-Profit Organization" and "Mission Waco World Cup Café, a Business."

2. On March 25, 2025, Plaintiff requested that Defendant agree to a ten-day extension of the Fact Discovery Deadline. The Parties currently have three of the four deponents Plaintiff has requested scheduled for April 14, 2025, and Plaintiff's deposition scheduled for April 23, 2025. The Parties are working to schedule one additional deponent that Plaintiff requested on March 29, 2025, but the final deposition will not be able to take place prior to the April 25, 2025 Fact Discovery Deadline. As a result, the Parties agree to a ten-day extension of the Fact Discovery Deadline to May 5, 2025.

3. Defendant has agreed to allow Plaintiff to extend the Fact Discovery Deadline to accommodate the deposition first requested on March 29, 2025. However, because Defendant will need time to receive the deposition transcript, Defendant also seeks a two-week extension of the Dispositive Motion Deadline. The new agreed Dispositive Motion Deadline would be May 16, 2025.

4. Pursuant to Local Rule 16(e), the Parties may extend discovery past the Fact Discovery Deadline in the Scheduling Order by agreement, so long as it does not delay pretrial preparations or the trial setting. The Parties' agreed extension of the Fact Discovery Deadline does not delay pretrial preparations or the trial setting and is mentioned in this motion to give context for seeking the agreed extension of the Dispositive Motion Deadline.

5. This extension is not sought for purposes of delay. Rather the extension is sought so that Plaintiff has adequate time to depose the deponents he has requested and so Defendant has adequate time to prepare its dispositive motion.

WHEREFORE, the Parties respectfully requests that this Court grant this Motion, extend the Dispositive Motion Deadline to May 16, 2025, and grant such further relief as the Court deems just and proper.

DATED: April 15, 2025

Respectfully submitted,

By: /s/ Lant Chapman

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PRO SE PLAINTIFF

By: /s/ Paul E. Hash

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

On April 2 – 3, 8 – 9, and 14, 2025, Defendant’s counsel conferred with pro se Plaintiff regarding the relief sought. Pro se Plaintiff confirmed that he agrees with the relief requested and the content of this motion.

/s/ Nicholé M. Plagens

Nicholé M. Plagens

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of April 2025, a copy of the foregoing pleading was served upon pro se Plaintiff via U.S. Mail and Certified Mail RRR.

/s/ Paul E. Hash

Paul E. Hash